

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	:	
Crystal Dejesus	:	Chapter 13
	:	
Debtor	:	Case No.: 16-10977ELF

MOTION TO MODIFY PLAN AFTER CONFIRMATION

The Debtor, by and through her undersigned counsel, hereby moves to modify her Chapter 13 Plan and in support thereof aver as follows:

1. Debtor filed a Chapter 13 Bankruptcy on or about February 16th, 2016.
2. The Chapter 13 filing was assigned case number 16-10977ELF.
3. The Plan here was Confirmed on July 12th, 2016.
4. For reasons beyond the Debtor's control, she fell slightly into arrears on her confirmed Plan, which has lead to a Trustee's Motion to Dismiss Case being filed.
3. The Debtor, recently had a new baby, and is going out on FMLA from December 2016 to March of 2017.
4. Although the Debtor's income will be drastically reduced during that time, it will come back to normal at the end of her FMLA period.
5. The Debtor wishes to complete her Bankruptcy in good faith, however is in need of a Modified Plan in order to do so.
6. The Debtor by and through her Counsel has drafted a proposed modified plan. Please see attached proposed modified plan marked as "**Exhibit A**" and incorporated herein.

7. This Plan does incorporate a step up in payments, however does not adversely affect or change the amount of distribution the unsecured creditors were set to receive in the Confirmed Plan.

WHEREFORE, the Debtor requests that she be permitted to modify her Chapter 13 Plan for the above stated reasons.

Dated: December 5, 2016

/s/Brad J. Sadek, Esq
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